

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MARIANNE ANNISZKIEWICZ,

Plaintiff,

Index No. 20-cv-6629
(FPG) (MWP)

v.

THE CITY OF ROCHESTER, a municipal entity,
POLICE OFFICER BRIAN CALA,
SERGEANT JENNIFER TRENTON,

Defendants.

Video-recorded Deposition Upon Oral Examination of:

Sergeant Jennifer Trenton

Location: Powers Building
16 West Main Street, 8th Floor
Rochester, New York 14614

Date: November 7, 2022

Time: 10:00 a.m.

Reported By: MICHELLE MUNDT ROCHA
Alliance Court Reporting, Inc.
109 South Union Street, Suite 400
Rochester, New York 14607



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S T I P U L A T I O N S

MONDAY, NOVEMBER 7, 2022;

(Proceedings in the above-titled matter
commencing at 10:10 a.m.)

* * *

IT IS HEREBY STIPULATED by and between the
attorneys for the respective parties that this
deposition may be taken by the Plaintiff at this time
pursuant to notice;

IT IS FURTHER STIPULATED, that all
objections except as to the form of the questions and
responsiveness of the answers, be reserved until the
time of the trial;

IT IS FURTHER STIPULATED, that pursuant to
Federal Rules of Civil Procedure 30(e)(1) the witness
requests to review the transcript and make any
corrections to same before any Notary Public;

IT IS FURTHER STIPULATED, that if the
original deposition has not been duly signed by the
witness and returned to the attorney taking the
deposition by the time of trial or any hearing in this
cause, a certified transcript of the deposition may be
used as though it were the original;

IT IS FURTHER STIPULATED, that the
attorneys for the parties are individually responsible



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out.

Do you have any recollection if that might have been a video or something else?

A. I would only guess that it was a video.

Q. And then 0092 says "Signals of increasing discomfort/stress/tension: Warning Signs"; is that right?

A. Yes, it is.

Q. And then the next one is "Aggression: Stop what you're doing." And that's 00093; right?

A. Yes, it is.

Q. And then if we continue for the next few pages up to 00097, we continue with basically pictures and descriptions of aggression?

A. Yes.

Q. And then 00098 says "Things can change very quickly. Dogs can give conflicting signals"; is that right?

A. Yes, it is.

Q. But it's a blacked-out page that maybe was a video?

A. That would be my guess, yes.

Q. And then the next page, 00099, says "Appeasement"; right?



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1 SERGEANT JENNIFER TRENTON - BY MR. SHIELDS

01:02 2 A. Yes.

01:02 3 Q. And then we'll go on for the next few
01:02 4 pages. And generally up through 00108, does it
01:03 5 continue to show pictures and describe the way that
01:03 6 dogs might be feeling, whether stressed or anxious or
01:03 7 angry?

01:03 8 A. Yes.

01:03 9 Q. And then there's a video that we're not
01:03 10 going to watch on 00109; is that correct?

01:03 11 A. Yes, there's a video there.

01:03 12 Q. Do you remember what that video showed?

01:03 13 A. I do not.

01:03 14 Q. And then it says "Best practice for
01:03 15 approaching dogs on the job" on page 110; correct?

01:03 16 A. Correct.

01:03 17 Q. It lists numerous things to look for at a
01:03 18 property in pictures; right?

01:03 19 A. Yes.

01:03 20 Q. And it lists "The Encounter: Announce
01:03 21 your arrival." It says "Jiggle the fence, whistle,
01:03 22 shake keys, inquire about dogs before entering, ask
01:04 23 for dog to be secured"; is that right?

01:04 24 A. That's correct.

01:04 25 Q. And that's all that says on that page;



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right?

A. Yes, it does.

Q. "Talk to the dog." I'm on the next page.

(As read): Communicate safely -- safety and

appeasement. If the dog approaches and is

non-threatening, allow him to investigate you.

Continue to speak to her. Do not attempt to pet the

dog.

Right?

A. That's what it says, yes.

Q. And that was page 113.

So we're just going to skip forward, okay,
to 115. Dog bite prevention tools -- or it just says
"Bite prevention tools"; right?

A. Yes.

Q. So "Physical repellents: Bite stick,
Baton/ASP; Umbrellas; Improvised: Flashlight, stick,
rolled-up magazine, clipboard, rode flare."

Do you remember from the training any
situations where those bite prevention tools -- you
were taught to maybe use those?

A. I'm sure that they went through scenarios
during this specific slide with that.

Q. But you don't recall any of those



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scenarios at this point?

A. I don't recall the specific scenarios, no.

Q. Okay. And on the next page, which is 116, it says "Bite prevention tools." And it lists "Chemical repellents: OC spray, citronella spray (direct stop); Electric repellents: Ultrasonic, stun guns, Tasers; Improvised: CO2 fire extinguisher."

Is that right?

A. That's correct.

Q. And do you remember any specific trainings about using any of those things?

MS. JONES: Objection.

A. So the only specific thing that I would recall from this would -- and I guess I shouldn't say that -- I don't recall the specific scenarios. However, for these and the other tools, you still need to make sure you have a backup plan in place for if these fail.

Q. Okay. So is that what you remember specifically from the training?

A. I would say from this specific thing, that's what I recall from the training from this. If we're talking about this specific slide.

Q. Specifically about using these various



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